

## **REMARKS**

The Office Action dated September 19, 2005 has been received and carefully noted. The following remarks are submitted as a full and complete response to the Office Action. Claims 1-16 are respectfully submitted for consideration.

The Office Action rejected claims 1-3 and 9-11 under 35 U.S.C. §103(a) as being obvious over US Publication No. 2002/0056001 to Magee et al. (Magee), in view of US Patent No. 6,526,506 to Lewis (Lewis). The Office Action took the position that Magee disclosed all of the features recited in the above claims, except for the feature of a request for a security association from a mobile node to a first network element. The Office Action asserted that Lewis disclosed this feature. Applicants respectfully submit that the cited references, taken individually or in combination, fail to disclose or suggest all of the features recited in the above mentioned claims.

Claim 1, from which claims 2-8 depend, recites a security association establishment negotiation method including forwarding identifying information and a request for a security association from a Mobile Node via a first interface to a first network element, and forwarding the identifying information and the request for a security association from the first network element to a second network element via a second interface. The method also performs negotiations between the first network element and the second network element via the second interface to establish a security association between the Mobile Node and the first network element, the second network

element utilizing previously stored security association parameters of the Mobile Node. Upon agreement between the first network element and the second network element with regard to the security association parameters, the first network element forwarding the agreed-upon security association parameters to the Mobile Node via the first interface.

Claim 9, from which claims 10-16 depend, recites a security association establishment negotiation apparatus for a Mobile Node. The apparatus includes a first interface connected to a first network element to forward identifying information and the request for a Security Association from the Mobile Node to the first network element. The apparatus also includes a second interface connected between the first network element and a second network element to forward the identifying information and the request for a Security Association from the first network element to a the second network element, the first network element performing negotiations between the first network element and the second network element to establish a Security Association between the Mobile Node and the first network element utilizing Security Association parameters of the Mobile Node previously stored in the second network element. Upon agreement between the first network element and the second network element with regard to the Security Association parameters, the first network element forwarding the agreed-upon Security Association parameters to the Mobile Node via the first interface.

Applicants respectfully submit that Magee and Lewis fail to disclose or suggest all the elements of any of the presently pending claims.

Magee is directed to a communication security system. Magee describes a mobile terminal 113 requesting services in a visited network (see Magee paragraphs [0029], [0031] – [0032]). Magee further describes that call control information flows from the serving CSCF (call state control function) 307 and the proxy CSCF 317, via the interrogating CSCFs 305 and 315 (see paragraph [0032]). In Magee, centralized security controllers of each subnetwork 201 and 203 establish a “security association” for the communicating units 115 and 135 (see paragraph [0018] and Figure 2). A pool of security associations are pre-established between home and visited networks (see paragraph [0030]).

Lewis describes a first level of encryption for wireless communications taking place between a mobile terminal and an access point (see column 2, lines 46-57 of Lewis). In addition, a second, higher level of encryption is provided which is distributed beyond the wireless communications onto the system backbone itself. The access point is provided which includes a transceiver for wirelessly communicating with mobile terminals. In Figure 11, and column 16 line 50 – column 17 line 7, Lewis discloses that an access point receives an association request in step 300. In step 306, there is an inquiry as to whether the association request is a request for secure access.

Applicants respectfully submit that the cited references taken individually or in combination, fail to disclose or suggest at least the feature of the first network element forwarding the agreed-upon security association parameters from the first network

element to the Mobile node via the first interface, as recited in claim 1 and similarly recited in claim 9.

Instead, at best the combination discloses that the security association is passed from serving CSCF 307 to the HSS 303, and not to the mobile terminal 113, as claimed in the present invention. See Magee Figure 3 and paragraph [0036]. Lewis fails to cure this deficiency.

Applicants respectfully submit that because claims 2, 3, 10 and 11 depend from claims 1 and 9 respectfully, these claims are allowable at least for the same reasons as claims 1 and 9. Further, Applicants respectfully submit that the cited references fail to disclose or suggest all of the features of these dependent claims.

Based at least on the above, Applicants respectfully submit that the cited references taken individually or in combination, fail to disclose or suggest all of the features recited in claims 1-3 and 9-11. Accordingly, withdrawal of the rejection of claims 1-3 and 9-11 under 35 U.S.C. 103(a) is respectfully requested.

The Office Action rejected claims 4-8 and 12-16 under 35 U.S.C. §103(a) as being obvious over Magee and Lewis, and further in view of US Patent No. 6,915,345 to Tummala et al. (Tummala). The Office Action took the position that Magee and Lewis disclosed all of the features of these claims except for the feature of the first network element being connected to a first gateway. The Office Action asserted that Tummala disclosed this feature. Applicants respectfully submit that the cited references taken

individually or in combination, fail to disclose or suggest all of the features recited in any of the above claims.

Specifically, Applicants submit that Magee and Lewis are deficient at least for the same reasons discussed above, and Tummala fails to cure these deficiencies.

Tummala is directed to an AAA broker specification and protocol for attaching of a mobile node to an IP mobile communications system and providing a secure Mobile Node connection to the home network. To eliminate the need for each network to establish individual SLA's (service level agreements) with every other service provider and network on the Internet, Broker AAA Servers can be assigned the responsibility of establishing and maintaining SLAs found on different networks (and reciprocal agreements with other SLAs and Broker AAA Servers). However, Tummala fails to mention, disclose or suggest at least the feature of forwarding the security association to the mobile terminal, as recited in claims 1 and 9, and therefore fails to cure the deficiencies of Magee and Lewis.

Based at least on the above, Applicants respectfully submit that the cited references taken individually or in combination, fail to disclose or suggest all of the features recited in claims 4-8 and 12-16. Accordingly, withdrawal of the rejection of these claims under 35 U.S.C. 103(a) is respectfully requested.

In view of the above, Applicants respectfully submit that the claimed invention recites subject matter which is neither disclosed nor suggested in the cited prior art.

Applicants therefore respectfully request that each of claims 1-16 be allowed and this application be passed to issue.

If for any reason the Examiner determines that the application is not now in condition for allowance, it is respectfully requested that the Examiner contact, by telephone, the Applicants' undersigned attorney at the indicated telephone number to arrange for an interview to expedite the disposition of this application.

In the event this paper is not being timely filed, the Applicant respectfully petitions for an appropriate extension of time. Any fees for such an extension together with any additional fees may be charged to Counsel's Deposit Account 50-2222.

Respectfully submitted,

A handwritten signature in dark ink, appearing to read "D.E.B.", is written over a horizontal line.

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